4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Natural Resources

Water Resources

Proposed Action Alternative

NPS Property and Mansion Property

Under the Proposed Action alternative, the amount of impervious surface and surface water runoff would slightly increase on the NPS Property due to the proposed secure driveway and guardhouse. Assuming two-thirds of a 600-foot driveway that is 15 feet in width is on the NPS Property, the increase would be less than 6000 square feet, or about 3% of the NPS Property. In accordance with District of Columbia regulations, BMPs would be implemented to control stormwater quantity and quality on the property and stormwater discharge rates from the property would be retained at predevelopment levels.

Development under the Proposed Action alternative would not directly disturb the stream present in the No Development Area on the eastern portion of the NPS Property. BMPs implemented to control stormwater, including maintaining a natural buffer along the stream, would avoid effects on the stream from increased runoff on the property. The wetlands associated with the stream would be similarly protected by the implementation of BMPs.

No floodplains are present on the NPS Property or Mansion Property. Therefore no floodplains would be affected by implementation of the Proposed Action alternative on the properties.

Groundwater flow at the NPS Property would not be confined due to implementation of the Proposed Action alternative. Development of the proposed secure driveway and guardhouse would slightly increase impervious surface on the property, thereby resulting in minor reduction of recharge area for groundwater on the properties.

On the Mansion Property, the amount of impervious surface and surface water runoff would slightly increase under the Proposed Action alternative due to the addition of the mayoral mansion and associated facilities including vehicular access and parking. These proposed facilities would be slightly larger than previous Brady Mansion. Therefore, the slight increase in impervious surface would result in a minimal reduction of recharge area for groundwater on the Mansion Property. In accordance with District of Columbia regulations, BMPs would be implemented to control stormwater quantity and quality on the property and stormwater discharge rates from the property would be retained at predevelopment levels.

Implementation of stormwater management in accordance with regulations would avoid potential impacts to water resources in the vicinity of the Mansion and NPS properties due to runoff, erosion and sedimentation. Development of the proposed secure entrance to the mayoral mansion would potentially require the improvement of the stormwater intake system

currently in place east of the intersection of Foxhall Road and Whitehaven Parkway. In addition, positive changes such as the addition of curb and gutter drainage have been proposed along Foxhall Road under alternative transportation programs of DDOT and would be implemented along the NPS and Mansion Properties as past of the mansion development. Overall, development under the Proposed Action alternative would contribute to positive changes regarding water resources in the vicinity of the NPS and Mansion Properties.

Georgetown Properties

The amount of impervious surfaces and surface water runoff would be reduced on the Georgetown Properties due to removal of the townhouses on the property. New development on the property would employ Best Management Practices (BMPs) which would contribute positively to stormwater control and would result in an increase in groundwater recharge area on the property.

The floodplain on the Georgetown Properties would be positively affected by removal of the townhouses under the Proposed Action alternative.

Overall, development under the Proposed Action alternative would contribute to positive changes regarding water resources in the vicinity of the Georgetown Properties.

Mitigation

To avoid impacts to water resources associated with increased impervious surfaces area and runoff, erosion and sediment control measures would be implemented (in compliance with the Department of Consumer and Regulatory Affairs (DCRA) permitting regulations) to minimize the potential for erosion, sedimentation and contamination due to development the proposed project.

No Federal Action Alternative

NPS Property and Mansion Property

Surface water runoff and flows on the NPS Property would not be affected by the No Federal Action alternative. Development under the No Federal Action alternative would not directly disturb the stream present on the NPS Property and BMPs implemented to control stormwater on the Mansion Property would avoid effects on the stream due to stormwater runoff from that property. The wetland associated with the stream would be similarly protected by the implementation of BMPs.

On the NPS property, there would be no changes regarding impervious surfaces and groundwater recharge area on the property.

Under the No Federal Action alternative, the amount of impervious surface and surface water runoff would increase on the Mansion Property due to the addition of the mayoral mansion and associated facilities including expanded vehicular access and parking. The impacts of

the increased runoff would be mitigated by BMPs implemented to control stormwater quantity and quality on the property and retain the predevelopment rate of stormwater discharge from the property.

No floodplains are present on the NPS Property or Mansion Property. Therefore no floodplains would be affected by implementation of the No Federal Action alternative on the properties.

Implementation of the No Federal Action alternative would not be expected to require confinement of groundwater flow at the Mansion Property. However, development of the proposed mansion and associated facilities would slightly increase impervious surface thereby resulting in minimal reduction of recharge area for groundwater on the property.

Under the No Federal Action alternative, implementation of stormwater management in accordance with regulations would avoid potential impacts to water resources in the vicinity of the Mansion and NPS properties due to runoff, erosion and sedimentation. In addition, positive changes such as the addition of curb and gutter drainage have been proposed along Foxhall Road under alternative transportation programs of DDOT and would be implemented along the Mansion Property as part of the mansion development. Overall, development under the No Federal Action alternative would not detract from positive changes regarding water resources in the vicinity of the NPS and Mansion Properties.

Georgetown Properties

The Georgetown Properties would not be affected by development under the No Federal Action alternative.

Mitigation

Mitigation would be implemented according to local and Federal regulations as described for the Proposed Action Alternative.

By-Right Development Alternative

NPS Property and Mansion Property

Under the By-Right Development alternative, the amount of impervious surfaces and surface water runoff at the NPS Property would not be affected.

The development under the By-Right Development alternative would not directly disturb the stream present on the NPS Property. In addition, BMPs implemented to control stormwater on the Mansion Property would avoid effects on the stream from increased runoff from the property. The wetland associated with the stream would be similarly protected by the implementation of BMPs.

Under the By-Right Development alternative, the amount of impervious surface and surface water runoff would substantially increase on the Mansion Property due to the development of a residential subdivision including houses, vehicular access and other associated facilities. The impacts of the increased runoff would be mitigated by BMPs implemented to control stormwater quantity and quality on the property and retain the predevelopment rate of stormwater discharging from the property.

Implementation of the By-Right Development alternative would not be expected to require confinement of groundwater flow on the Mansion Property. However, development of the residential subdivision would substantially increase impervious surface areas thereby resulting in a major reduction of recharge area for groundwater on the Mansion Property.

No floodplains are present on the NPS Property or Mansion Property. Therefore no floodplains would be affected by implementation of the By-Right Development alternative on the properties.

While ground water recharge on the Mansion Property would be reduced under the By-Right Development alternative, implementation of stormwater management in accordance with regulations would avoid potential impacts to water resources in the vicinity of the Mansion and NPS properties due to runoff, erosion and sedimentation. In addition, positive changes such as the addition of curb and gutter drainage have been proposed along Foxhall Road under alternative transportation programs of DDOT and may not be implemented immediately under the By-Right Development alternative. Overall, development under the By-Right Development alternative changes regarding water resources in the vicinity of the NPS and Mansion Properties.

Georgetown Properties

The Georgetown Properties would not be affected by development under the By-Right Development alternative.

Mitigation

Mitigation would be implemented according to local and Federal regulations as described for the Proposed Action Alternative.

Geophysical Resources

All Alternatives

The geologic materials located beneath (and in the vicinity of) the NPS Property, Georgetown Properties, and Mansion Property would not be affected by implementation of the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative.

Proposed Action Alternative

NPS Property and Mansion Property

Under the Proposed Action alternative, grading and site work during development of the secure access for the mayoral mansion would slightly alter the topography of a portion of the NPS Property. The specific composition of soils on the property would be altered by grading activities. However, the character of the existing urban soil associations on the property would not be adversely affected by such change.

On the Mansion Property, the grading and site work necessary for the development of the mayoral mansion facilities and grounds would slightly alter the topography of the property. The specific composition of soils on the property would be altered by grading activities. However, the character of the existing urban soil associations on the property would not be adversely affected by such change.

The potential for soil erosion during grading activities would be heightened by the addition of impervious surfaces on the NPS Property and the Mansion Property. However, as previously discussed, BMPs implemented to control stormwater quantity and quality would mitigate the potential for erosion.

Under the Proposed Action alternative, the overall character of the modified topography and the composition of the urban soil associations in the vicinity of the properties would be negligibly affected by the changes.

Georgetown Properties

The demolition of the townhouses at the Georgetown Properties and establishment of parkland would not require significant alteration of the property topography. However slight changes to the topography through grading would possibly be pursued by the NPS to lend aesthetic appeal to the property after removal of the townhouses. The urban soils present on the property could potentially be positively affected by the addition of topsoil suitable for vegetation during such grading.

Overall, the proposed demolition of the townhouses on the Georgetown Properties would not adversely affect the geophysical resources in the vicinity of the properties.

Mitigation

Mitigation of erosion impacts would be implemented as described regarding water resources.

No Federal Action Alternative

NPS Property and Mansion Property

Under the No Federal Action alternative, topography and soils at the NPS Property would not be affected.

On the Mansion Property, the grading and site work necessary for the development of the mayoral mansion facilities and grounds would slightly alter the topography of the property. The specific composition of soils on the property would be altered by grading activities. However, the character of the urban soil associations present on the Mansion Property would not be adversely affected by such change. The potential for soil erosion during grading activities would be heightened by the addition of impervious surfaces on the Mansion Property. However, as previously discussed, BMPs implemented to control stormwater quantity and quality would mitigate the potential for erosion.

Under the Proposed Action alternative, the overall character of the modified topography and the composition of the urban soil associations in the vicinity of the properties would be negligibly affected by the changes.

Georgetown Properties

Under the No Federal Action alternative, topography and soils at the Georgetown Properties would not be affected.

Mitigation

Mitigation of erosion impacts would be implemented as described regarding water resources.

By-Right Development Alternative

NPS Property and Mansion Property

Under the By-Right Development alternative, topography and soils at the NPS Property would not be affected.

On the Mansion Property the grading and site work necessary for the development of a residential subdivision would alter the topography of the property. The specific composition of soils on the property would be also altered by grading activities. The character of the urban soil associations present on the Mansion Property would not be adversely affected by such change. The potential for soil erosion during grading activities would be heightened by the substantial addition of impervious surfaces on the Mansion Property. However, as

previously discussed, BMPs implemented to control stormwater quantity and quality would mitigate the potential for erosion.

Under the By-Right Development alternative, grading and site work would alter the existing topography and specific composition soils on the Mansion Property are described above. However, the overall character of the modified topography and urban soil associations in the vicinity of the NPS Property and Mansion Property would be negligibly affected by the changes.

Georgetown Properties

Under the By-Right Development alternative, topography and soils at the Georgetown Properties would not be affected.

Mitigation

Mitigation of erosion impacts would be implemented as described regarding water resources.

Vegetation and Wildlife Habitat

Proposed Action Alternative

NPS Property and Mansion Property

Implementation of the Proposed Action alternative would require the removal of a relatively small amount of vegetation and wildlife habitat outside of the identified no development area for the installation of the secure driveway and gatehouse. BMPs will be implemented to control stormwater quantity and quality on the property as previously discussed. Thus, the remaining vegetation and habitat would be negligibly affected by the slightly altered topography, water drainage patterns, and increased impervious surfaces under the Proposed Action.

Given the previously described limitations to wildlife movement associated with the location of the NPS Property next to Foxhall Road, the proposed perimeter fencing on the NPS Property would likely result in minimal effects to valuable biological connectivity. In addition, vines and other invasive plant species would likely be removed from the NPS property to improve appearances from the mansion grounds, thus improving the health of vegetation remaining on the NPS Property.

Implementation of the Proposed Action alternative would also require the removal of a proportionally small amount of vegetation from the Mansion Property. If BMPs are implemented to control stormwater quantity and quality on the property as previously discussed, the remaining vegetation would be negligibly affected by the slightly altered physical conditions under the Proposed Action.

In total, a relatively small amount of vegetation and habitat on the NPS Property and the Mansion Property would be affected by development of the proposed mayoral mansion facilities and grounds. There are extensive amounts of vegetation and habitat that would remain on the NPS Property and in the adjacent Glover Archbold Park. Therefore, the alternative would be expected to have a negligible overall functional affect on vegetation and habitat in the vicinity of the properties.

Georgetown Properties

Implementation of the Proposed Action alternative would likely improve conditions by adding vegetation and/or habitat at the currently developed Georgetown Properties through the removal of the townhouses and subsequent landscape treatments.

Mitigation

Mitigation should be implemented to reduce the population of invasive exotic plant species in the forested areas of the NPS Property.

Other specific recommendations regarding the treatment of the NPS property are included in the biological inventory completed for the property. The Biological Resources Inventory Report can be reviewed in Section 5.5 of the Appendix.

No Federal Action Alternative

NPS Property and Mansion Property

Implementation of the No Federal Action alternative would not directly disturb vegetation or habitat at the NPS Property.

Under the No Federal Action alternative, development of the mayoral mansion and grounds would require minimal removal of vegetation and wildlife habitat from the Mansion Property. Negligible sensitive vegetation or valuable habitat on the previously developed Mansion Property would be affected by development under the No Federal Action alternative. However, removal of vegetation on the Mansion Property could increase light levels in forested portions of the adjacent NPS Property leading to higher potential for proliferation of invasive species.

While vegetation and habitat would be removed from the Mansion Property under the No Federal Action Alternative, the presence of abundant amounts of vegetation and habitat at the adjacent NPS Property and in Glover-Archbold Park would minimize the functional effect of the development on vegetation and habitat in the vicinity of the property.

Georgetown Properties

Implementation of the No Federal Action alternative would not disturb vegetation or habitat at the Georgetown Properties.

Mitigation

Removal of existing vegetation should be planned, and control of new growth implemented, to avoid an increase of invasive exotic plant species on the NPS Property.

By-Right Development Alternative

NPS Property and Mansion Property

Implementation of the By-Right Development alternative would not directly disturb vegetation or habitat at the NPS Property.

Under the By-Right Development alternative, a residential subdivision on the Mansion Property would require extensive removal of vegetation and habitat from the property. Effects on the remaining vegetation and habitat on the property could result from substantially increased human and vehicular traffic, altered topography and water drainage patterns and increased impervious surfaces. Negligible sensitive vegetation or valuable habitat on the previously developed Mansion Property would be affected by development under the No Federal Action alternative. However, removal of vegetation on the Mansion Property could increase light levels in forested portions of the adjacent NPS Property leading to higher potential for proliferation of invasive species.

While substantial vegetation and habitat would be removed from the Mansion Property under the By-Right Development alternative, the presence of abundant amounts of habitat at the adjacent NPS Property and Glover-Archbold Park would minimize the functional affects of the development on vegetation and habitat in the vicinity of the property.

Georgetown Properties

Implementation of the By-Right Development alternative would not directly disturb vegetation or habitat at the NPS or Georgetown properties.

Mitigation

Removal of existing vegetation should be planned, and control of new growth implemented, to avoid an increase of invasive exotic plant species on the NPS Property.

Air Quality

Proposed Action Alternative

NPS Property, Mansion Property, and Georgetown Properties

Under the Proposed Action alternative, construction at the NPS property and Mansion Property may have short-term effects on air quality as a result of heavy equipment emissions, fugitive dust, and emissions of vehicles driven to the sites by workers. The emissions produced during construction and demolition activities would vary depending on the activities. The specific types of equipment that would be used for demolition, grading, utility installation, paving, and building construction are not known, nor has the schedule for these activities been defined. When specific plans for the activities are developed, emissions can be estimated using techniques compiled and published by different air quality management districts. The standard factors to be used for estimating emissions are based on U.S. Environmental Protection Agency Compilation of Air Quality Emission Factors (commonly referred to as AP-42). For the proposed action, the estimated emissions, including emissions from personal vehicle travel to and from the sites, are predicted to be less than the de minimis thresholds and less than 10 percent of the projected area emissions.

Implementation of the Proposed Action alternative would result in minimal long term impacts to local air-quality at the NPS property and Mansion property due to a negligible increase in localized emissions of criteria pollutants by motor vehicles used by residents, employees and visitors of the proposed mayoral facilities. Localized CO levels could be elevated temporarily during times of high volume ingress or egress at the facilities.

As described in the preceding discussion, development under the Proposed Action alternative would result in short-term effects on air quality associated with construction and demolition activity at the NPS Property and Mansion Property. In addition, the Proposed Action alternative could lead to minimal long-term air-quality impacts associated with use and operation of the proposed facilities. The short-term and long-term affects of the Proposed Action would be localized and diminish rapidly in areas removed from the project properties. Overall, the Proposed Action would result in negligible effects on air quality in the vicinity of the project properties.

Georgetown Properties

Under the Proposed Action alternative, demolition at the Georgetown Properties would have the same short-term effects on air quality as those described for the NPS Property and Mansion Property. Development under the Proposed Action would not result in long-term effects on air quality.

Mitigation

During construction and demolition, fugitive dust production would be mitigated by implementation of dust control measures such as the application of soil stabilizers or water exposed soils, covering soil stockpiles, and cleaning equipment.

No Federal Action Alternative

NPS Property and Mansion Property

Due to distances from the proposed construction activity, development under the No Federal Action alternative would result in minimal air quality effects at the NPS Property.

Development of the mayoral mansion and grounds under the No Federal Action alternative would result in effects on air quality at the Mansion Property similar to those under the Proposed Action alternative.

As explained for the Proposed Action alternative, construction at the Mansion Property under the No Federal Action alternative would result in negligible short-term and long-term effects effect on air quality in the vicinity of the property

Georgetown Properties

Development under the No Federal Action alternative would not affect air quality at the Georgetown Properties.

Mitigation

As described for the Proposed Action alternative, during construction and demolition, fugitive dust production would be mitigated by implementing dust control measures such as the application of soil stabilizers or water exposed soils, covering soil stockpiles, and cleaning equipment.

By-Right Development Alternative

NPS Property and Mansion Property

Due to distances from the proposed development area, construction under the By-Right Development alternative would result in minimal short-term air quality effects at the NPS Property. Over the long-term use of the proposed subdivision, locally elevated CO levels present during times of high-volume ingress or egress from the subdivision would potentially adversely affect air quality at the NPS property.

By-right development of the Mansion Property in a residential subdivision would result in short-term construction-related effects on air quality at the Mansion Property similar to those under the Proposed Action alternative. Over the long-term use of the proposed subdivision, elevated CO levels present during mass ingress and egress from the subdivision would have adverse effects on air quality at the Mansion Property.

As described for the Proposed Action alternative, construction at the Mansion Property under the By-Right Development alternative would result in negligible short-term effects effect on air quality in the vicinity of the property. However, the long-term residential use of the proposed subdivision at the Mansion Property would likely result in minor adverse impacts to air quality in the vicinity of the property due to high volume automobile traffic times of high-volume ingress and egress at the subdivision.

Georgetown Properties

Development under the By-Right Development alternative would not affect air quality at the Georgetown Properties.

Mitigation

As described for the Proposed Action alternative, during construction and demolition, fugitive dust production would be mitigated by implementing dust control measures such as the application of soil stabilizers or water exposed soils, covering soil stockpiles, and cleaning equipment.

Mitigation to reduce localized impacts on air quality under the By-Right Development alternative would include planning for the transportation system of the proposed subdivision to operate at a high level of service. A signalized intersection of the subdivision drive and Foxhall Road would potentially reduce backups and standing traffic in the subdivision.

Noise Levels

All Alternatives

NPS Property and Mansion Property

At the NPS Property the effects of the Proposed Action alternative, No Federal Action alternative, and the By-Right Development alternative on ambient noise levels would primarily be associated with short-term construction and demolition activities. Noise generated by equipment during all phases of construction and demolition activities would result in intermittent short-term noise effects for the duration of these activities.

The noise produced during construction or demolition would vary depending on particular scheduled activities. The specific types of equipment that would be used for demolition and construction under the alternatives have not been specified at this time. Table 4-1 presents typical noise levels for various types of construction equipment. Construction and demolition activity would be required to comply with the District of Columbia noise control regulations. Between 7 a.m. and 7 p.m., noise generated by equipment (except for pile drivers) may not exceed 80 dB(A) at a distance 25 feet outside of the subject site. Additionally, between 7 p.m. and 7 a.m., noise generated by equipment may not exceed 55 dB(A) at a distance of 25 feet from the subject site.

At the Mansion Property, as described for the adjacent NPS Property, the effects of the Proposed Action alternative, No Federal Action alternative, and the By-Right Development alternative on ambient noise levels would primarily be associated with equipment used for the proposed short-term construction activities at the property. The effects and regulations pertaining to noise levels at the property would be the same as those previously described for the NPS Property.

The development of the mayoral facilities or residential subdivision under the alternatives would also result in long-term increases in perceived noise levels on and in the vicinity of the NPS Property and Mansion Property by increasing traffic on or near the properties. Typically, a doubling of traffic volume will result in a noticeable increase in noise. The development of the Proposed Action or No Federal Action alternative would potentially generate a doubling of traffic volume onto the Mansion Property. Development of the residential subdivision under the By-Right Development alternative would double traffic on the Mansion Property many times and substantially increase noise levels in the vicinity of the property. Minor intermittent noise levels in the vicinity of the Mansion Property could also be increased by heating, ventilating, air conditioning, and facilities maintenance equipment associated with operation of facilities under the three alternatives.

Georgetown Properties

At the Georgetown Properties, the effects of the Proposed Action alternative, No Federal Action alternative, and the By-Right Development alternative on ambient noise levels would be short term effects associated with equipment used for the proposed short-term demolition activities at the property. The effects and regulations pertaining to noise levels at the property would be the same as those previously described for the NPS Property.

Mitigation

No mitigation regarding noise levels would be necessary under the Proposed Action, No Federal Action, or By-Right Development alternatives.

Table 4-1 Construction Equipment Noise Levels at 50 Feet, Before and After Mitigation (dB(A))

Equipment Type	Without Noise Control	With Feasible Noise Control ¹
Earthmoving		
Front Loaders	79	75
Backhoes	85	75
Dozers	80	75
Tractors	80	75
Scrapers	88	80
Graders	85	75
Truck	91	75
Pavers	89	80
Materials Handling		
Concrete Mixe	rs 85	75
Concrete Pump	os 82	75
Cranes	83	75
Derricks	88	75
Stationary		
Pumps	76	75
Generators	78	75
Compressors	81	75
Impact		
Pile Drivers	101	95
Jack Hammers	88	75
Pneumatic Too	ls 86	80
Other		
Saws	78	75
Vibrators	76	75

¹ Estimated levels obtainable by selecting quieter procedures or machines and implementing noise control features requiring no major redesign or extreme cost.

Source: U.S. Environmental Protection Agency, 1971

Hazardous Materials

All Alternatives

NPS Property and Mansion Property

Under implementation of the Proposed Action alternative, the NPS would conduct a Phase I Environmental Site Assessment on the NPS Property to inspect for the potential presence of hazardous materials. Since there are no known records or indications of existing hazardous materials on the NPS Property, no impacts associated with hazardous materials are expected under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative.

There are also no known records or indications of existing hazardous materials on the Mansion Property. Therefore no impacts associated with hazardous materials are expected under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative.

In addition, development under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative would not be expected to introduce hazardous materials to the NPS Property or Mansion Property.

Since there are no known records or indications of existing hazardous materials on the NPS Property or Mansion Property, and development under the alternatives would not introduce hazardous materials to the properties, no impacts associated with hazardous materials are expected in the vicinity of the properties under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative.

Georgetown Properties

Since there are no known records or indications of existing hazardous materials on the Georgetown Properties, no impacts associated with hazardous materials are expected under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative. In addition, development under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative would not be expected to introduce hazardous materials to the Georgetown Properties. Accordingly no impacts associated with hazardous materials are expected on or in the vicinity of the Georgetown Properties under the Proposed Action alternative, the No Federal Action alternative, or the By-Right Development alternative.

Mitigation

No mitigation regarding hazardous materials would be necessary under the subject alternatives.

4.2 Cultural Resources

Archaeological Resources

Proposed Action Alternative

NPS Property and Mansion Property

Although there are no known archaeological resources on the NPS property, its proximity to known prehistoric sites in Glover-Archbold Park makes it possible that prehistoric sites might be located on the NPS Property. However, late 19th and 20th century activities, such as pond construction, utilities lines, and fill, have disturbed the NPS property to the degree that there is a very low probability of any remaining intact archaeological resources eligible for listing on the National Register.

In addition to the evidence of prehistoric activities observed on the Mansion Property, its proximity to known prehistoric sites in Glover-Archbold Park also increases the possibility for prehistoric sites on the property. Since construction of the mansion would involve ground-disturbing activities, the proposed action may generate adverse effects on archaeological resources present on the property.

Georgetown Properties

The townhouses on the Georgetown Properties would be demolished and the property would be transferred to the NPS for parkland. This proposed action would create an open space setting and potential site for a boathouse that would preserve the integrity and setting of the Potomac Aqueduct Abutment and Pier Ruins.

Mitigation

Mitigation should consist of archaeological monitoring and, if necessary, resource recovery consistent with the Secretary of Interior Standards, on the NPS Property, Mansion Property and Georgetown Properties as development occurs. Should artifacts be encountered during the construction process, activities will cease while appropriate studies, consultation, and mitigation steps are conducted.

No Federal Action Alternative

NPS Property and Mansion Property

Under this alternative, the NPS Property would remain in NPS ownership and would not be developed. Therefore, this alternative would not affect archaeological resources.

Evidence of prehistoric activities has been observed on the Mansion Property. Since construction of the Mansion would involve ground-disturbing activities, construction may generate adverse effects on archaeological resources on the property.

Georgetown Properties

Under the No Federal Action alternative, the Foundation would not convey interests in the Georgetown Properties to the NPS and no demolition or construction activities would occur.

Mitigation

Mitigation should consist of archaeological monitoring and resource recovery, consistent with the Secretary of Interior Standards, on the Mansion Property as development occurs. Should artifacts be encountered during the construction process, activities will cease while appropriate studies, consultation, and mitigation steps are conducted.

By-Right Development Alternative

NPS Property and Mansion Property

Under the By-Right Development alternative, the NPS Property would remain in NPS ownership and would not be developed.

Evidence of prehistoric activities has been observed on the Mansion Property. Since by-right development of housing units would involve extensive ground-disturbing activities, this may generate adverse impacts on archaeological resources present on the property.

Georgetown Properties

Under this alternative, the Foundation would not convey interests in the Georgetown Properties to the NPS and no demolition or construction activities would occur.

Mitigation

Mitigation should consist of archaeological monitoring and resource recovery, consistent with the Secretary of Interior Standards, on the Mansion Property as development occurs. Should artifacts be encountered during the construction process, activities will cease while appropriate studies, consultation, and mitigation steps are conducted.

Historic and Cultural Resources

Proposed Action Alternative

NPS Property and Mansion Property

Construction associated with the Proposed Action alternative on the NPS Property and Mansion Property would generate negative short-term traffic and noise effects. These effects could affect visitation and access to the nearby cultural resources. In the long term, however, the Proposed Action alternative would be compatible with the historic and cultural character of the area, and return the Mansion Property to the original configuration of the Brady Estate.

Georgetown Properties

The Proposed Action alternative includes demolition of the townhouses to create additional open space and potentially a site for a boathouse. Care would be taken to create a more appropriate setting in which to showcase the adjacent historic resources of the Key Bridge and the Potomac Boat Club.

Mitigation

Although the Georgetown properties are not historic resources, they are part of the Georgetown Historic District. Thus, the proposed demolition would require review by the DC Office of Historic Preservation.

No Federal Action Alternative

NPS Property and Mansion Property

Construction associated with the No Federal Action alternative on the Mansion Property would generate negative short-term traffic and noise effects. In the long term, the No Federal Action alternative would be compatible with the historic and cultural character of the area, but would not return the Mansion Property to the original configuration of the Brady Estate.

Georgetown Properties

Since the Georgetown Properties would not be involved, this alternative would not generate adverse effects on them. Likewise, this alternative would not generate effects on the historic resources in proximity to the Georgetown properties.

Mitigation

Mitigation should be implemented to preserve and enhance the historic character on the area in the vicinity of the Mansion Property.

By-Right Development Alternative

NPS Property and Mansion Property

Construction associated with the By-Right Development alternative would generate negative short-term traffic and noise effects. These impacts could affect visitation and access to the nearby cultural resources. In the long term, the alternative would not be compatible with the historic and cultural character of the area.

Georgetown Properties

Since the Georgetown Properties would not be involved, this alternative would not generate adverse effects on them. Likewise, this alternative would not generate effects on the historic resources in proximity to the Georgetown properties.

Mitigation

Mitigation should be implemented to preserve and enhance the historic character of area in the vicinity of the Mansion Property. In particular, new housing units should be designed to be compatible with the general massing, materials, architectural details, and character prevalent in Foxhall Village.

Visual Resources

Proposed Action Alternative

NPS Property and Mansion Property

Under the Proposed Action alternative, vines and other invasive plant species would likely be removed from the NPS Property to improve the appearance from the mansion grounds and surrounding areas.

The Mansion and NPS properties would become more manicured open space. This change would be generally compatible with the settings of the surrounding residential and institutional uses.

Georgetown Properties

Under this alternative, demolition of the townhouses on the Georgetown Properties would help alleviate the cluttered appearance of the waterfront area by providing additional landscaped open space and/or a well-designed scholastic boathouse.

Mitigation

Mitigation would be implemented to reduce the population of invasive exotic plant species on the NPS Property.

No Federal Action Alternative

NPS Property and Mansion Property

Under this alternative, the NPS Property would not be exchanged and would remain in its current transitional condition.

The Mansion Property would become a more manicured open space, which would be generally compatible with the settings of the surrounding residential and institutional areas.

Georgetown Properties

The Georgetown Properties would remain as a cluttered mix of uses and visual character.

Mitigation

No mitigation regarding visual resources would be necessary under the No Federal Action Alternative.

By-Right Development Alternative

NPS Property and Mansion Property

Under this alternative, the NPS property would remain in its current transitional condition.

Under this alternative, the construction of single-family houses would induce a high degree of visual change to the Mansion Property. However, the houses' configuration, density and setting would be consistent with the character of the nearby neighborhoods.

Georgetown Properties

The Georgetown Properties would remain as a cluttered mix of uses and visual character.

Mitigation

No mitigation regarding visual resources would be required under the By-Right Development Alternative.

4.3 Socioeconomic Environment

Land Use

Proposed Action Alternative

NPS Property and Mansion Property

The Proposed Action would change the land use of the NPS Property from transitional forest land to land with minor improvements on a portion of the grounds. The thick growth of vines on the remaining vegetation would likely be removed to improve appearances from the Mansion Property. This would improve the vegetation health on the property and result in more usable open space contiguous with the Mansion Property.

The Proposed Action would return the Mansion Property to one unified property with low-density residential use. This proposed low-density use is compatible with the nearby large residential properties and institutional campuses.

Georgetown Properties

Use of the Georgetown Properties as NPS parkland would improve the land use character of the property. Instead of the current disjointed office and open space use, the property would become part of the surrounding open space system and contribute to the Georgetown Waterfront Park, potentially providing the possible site of a scholastic boathouse for high school rowing programs.

Mitigation

No mitigation regarding land use would be necessary under the Proposed Action alternative.

No Federal Action Alternative

NPS Property and Mansion Property

Under the No Federal Action alternative, the NPS would retain the NPS Property with its current open space character.

Construction of the mansion would be implemented on the existing Mansion Property in an alternate configuration. This low-density residential use is consistent with existing land use on the property and the surrounding area.

Georgetown Properties

The Georgetown Properties would not be affected by the No Federal Action alternative. The properties would likely remain in small office uses under this alternative and would continue to be incompatible with the open space character of the planned Georgetown Waterfront Park.

Mitigation

No mitigation regarding land use would be necessary under the No Federal Action Alternative.

By-Right Development Alternative

NPS Property and Mansion Property

The NPS Property would continue to be open space owned by NPS. This land use would be generally compatible with surrounding uses.

The By-Right Development alternative would substantially alter the physical character of the Mansion Property by introducing as many as 42 to 136 single-family houses to the site. This development would be compatible with surrounding land uses and zoning but would have an adverse impact on surrounding uses.

Georgetown Properties

The Georgetown Properties would remain as office uses, which would continue to be incompatible with the uses at the Georgetown Waterfront.

Mitigation

No mitigation regarding land use would be required under the By-right Development alternative.

Planning Policies

Proposed Action Alternative

NPS Property and Mansion Property

The Proposed Action alternative would construct a single mayoral mansion with ancillary buildings on the northern portion of the Mansion Property. This development would be of a lower density than the zoning envelope and the surrounding residential neighborhoods; therefore the development conforms to the provisions for development on the Mansion Property. This alternative would also allow associated improvements, grading, and landscaping on the current NPS Property outside of the "no development zone." This limited development complies with the parks, open space, and natural features element of the Federal Elements.

Georgetown Properties

Under this alternative, the Georgetown Properties would be transferred to the National Park Service, who would utilize the Georgetown Properties as parkland and potentially as the site for a scholastic boathouse for high school rowing programs. While the NPS, as a federal agency, is not required to comply with local zoning ordinances, the proposed open space use would be much less intensive than the existing W-1 zoning regulations allow. The removal of the townhouses and development of the property as National Park Service parkland would also fulfill the goals and objectives of the *Georgetown Waterfront Park Plan* and the Generalized Land Use Map.

Mitigation

No mitigation regarding planning controls and policies land use would be necessary under the Proposed Action Alternative.

No Federal Action Alternative

NPS Property and Mansion Property

Under this alternative, the NPS would retain the NPS Property in its current state. This proposed continued open space use fulfills the land use policies for the property.

Construction of the mansion would be implemented on the existing Mansion Property in an alternate configuration, which would comply with land use policies for the site.

Georgetown Properties

The Foundation would not convey interests in the Georgetown Properties to the NPS and the property would likely remain residential. While this use complies with existing zoning

regulations for the property, it does not fulfill the open space objectives of the *Georgetown Waterfront Park Plan* or the Generalized Land Use Map.

Mitigation

No mitigation regarding planning controls and policies land use would be necessary under the No Federal Action alternative.

By-Right Development Alternative

NPS Property and Mansion Property

Under this alternative, the NPS would retain the NPS Property in its current state. This proposed continued open space use fulfills the land use policies for the property.

The By-Right Development alternative assumes development of the Mansion Property as a residential subdivision. Subdivision development at any density less than 8 units per acre would be in accordance with current R-1-B zoning. However, development greater than 3 units per acre could infringe upon the parks, open space, and natural features element of the Federal Elements, which calls for low density development adjacent to the Glover-Archbold Park and Whitehaven Parkway.

Georgetown Properties

The Foundation would not convey interests in the Georgetown Properties to the NPS and the land would remain as a residential use. While this use complies with existing zoning regulations for the property, it does not fulfill the open space objectives *Georgetown Waterfront Park Plan* or the *Generalized Land Use Map*.

Mitigation

No mitigation regarding planning controls and policies land use would be necessary under the By-Right Development alternative.

Demographics and Environmental Justice

Proposed Action Alternative

All Properties

Since there are no environmental justice communities in the study areas, there would be no environmental justice impacts as a result of this alternative.

NPS Property and Mansion Property

The Proposed Action would construct one housing unit to the NPS Property and Mansion Property study area. This change would have a negligible effect on the demographic composition of the area.

Georgetown Properties

Under this alternative, the townhouses would be demolished and the Georgetown Properties would be transferred to the NPS for parkland; this use would neither add nor displace any residential populations to the study area.

Mitigation

No mitigation regarding demographics and environmental justice would be necessary under the Proposed Action Alternative.

No Federal Action Alternative

All Properties

Given the absence of any environmental justice communities in the study areas, there would be no environmental justice impacts as a result of this alternative.

NPS Property and Mansion Property

Under this alternative, the NPS Property would not experience any change. One housing unit would be constructed on the Mansion Property, which would have a negligible effect on the demographic composition of the area.

Georgetown Properties

Under the No Federal Action alternative, the Foundation would not convey interests in the Georgetown Properties to the NPS; therefore, no residential populations would be added to or displaced from the study area.

Mitigation

No mitigation regarding demographics and environmental justice would be necessary under the No Federal Action Alternative.

By-Right Development Alternative

All Properties

Since there are no environmental justice communities in the study areas, there would be no environmental justice impacts as a result of this alternative.

NPS Property and Mansion Property

Under this alternative, the NPS Property would not experience any change. As many as 42-136 housing units could be added to the Mansion Property study area, which would increase the residential population of the area.

Georgetown Properties

As under the No Federal Action alternative, there would be no impacts to the demographic character of the study area.

Mitigation

No mitigation regarding demographics and environmental justice would be necessary under the By-Right Development Alternative.

Community Facilities

Proposed Action Alternative

NPS Property and Mansion Property

The Proposed Action alternative could generate short-term construction-related traffic impacts, which could affect access to nearby schools and other community facilities.

Georgetown Properties

This alternative's proposal to demolish the townhouses and create federally owned open space and possibly the site of a scholastic boathouse for high school rowing would generate positive effects on the parks and recreation facilities. This action would be an important contribution to creating a waterfront park, as envisioned in citywide plans.

Mitigation

Construction activities under the Proposed Action alternative should be planned to minimize interference with traffic associated with nearby schools and other community facilities near the NPS Property and Mansion Property.

No Federal Action Alternative

NPS Property and Mansion Property

Construction related to this alternative at the Mansion Property could generate short-term traffic impacts, which could affect access to nearby schools and other community facilities.

Georgetown Properties

This alternative would not induce any change to the Georgetown Properties; therefore, there would be no impact on community facilities in the study area.

Mitigation

Construction activities under the No Federal Action Alternative should be planned to minimize interference with traffic associated with nearby schools and other community facilities near the Mansion Property.

By-Right Development Alternative

NPS Property and Mansion Property

Construction related to implementation of this alternative at the Mansion Property could generate short-term traffic impacts, which would affect access to nearby schools and other

community facilities. In addition, the increase in houses and residents associated with this alternative would create additional demand for community facilities in the area around the Mansion Property. While existing facilities may initially satisfy the demand, the population increase may create a need for construction of additional facilities in the long term.

Georgetown Properties

The By-Right Development alternative would not induce any change to the Georgetown Properties; therefore, there would be no impact on community facilities in the study area.

Mitigation

Construction activities under the By-Right Development Alternative should be planned to minimize interference with traffic associated with nearby schools and other community facilities near the Mansion Property.

Economics

Proposed Action Alternative

NPS Property and Mansion Property

The NPS Property would be transferred to the Foundation's ownership. This would allow for development of the proposed mayoral mansion on the Mansion Property and for limited development of the NPS Property as part of the mansion grounds. Although the NPS and Mansion Properties would not be taxable properties, the Proposed Action would have indirect economic benefits by contributing to the prestige of the city and viability of the neighborhood.

Georgetown Properties

The Proposed Action alternative would demolish the townhouses and convey the land to the NPS, thereby resulting in a decrease in taxable property. However, the implementation of the Georgetown Waterfront Plan would have indirect economic benefits over the long term.

Mitigation

No mitigation regarding economics would be necessary under the Proposed Action Alternative.

No Federal Action Alternative

NPS Property and Mansion Property

The NPS Property would continue to be in federal ownership and would not contribute taxes to the District of Columbia. The proposed mansion would be constructed on the existing Mansion Property by the tax exempt Foundation.

Georgetown Properties

Under the No Federal Action alternative, the Foundation would not convey interests in the Georgetown Properties to the NPS. Therefore, the District of Columbia would continue to collect taxes from the Properties.

Mitigation

No mitigation regarding economics would be necessary under the No Federal Action Alternative.

By-Right Development Alternative

NPS Property and Mansion Property

The NPS Property would continue to be in federal ownership and would not contribute property taxes to the District of Columbia. The Mansion Property is in a prominent location and is highly valued, thereby offering high development potential. By-Right development of residential units would generate increased property tax revenue for the District of Columbia.

Georgetown Properties

Under the No Federal Action alternative, the Foundation would not convey interests in the Georgetown Properties to the NPS. Therefore, the District of Columbia would continue to collect taxes from the Properties.

Mitigation

No mitigation regarding economics would be necessary under the By Right Development Alternative

4.4 Transportation and Urban Systems

Automobile Transportation

Proposed Action Alternative

NPS Property and Mansion Property

The Proposed Action alternative would result in the development of a new secure driveway extending from the intersection of Foxhall Road and Whitehaven Parkway through the NPS Property to the proposed mayoral mansion on the Mansion property. Parking associated with the proposed mansion would be located entirely within the Mansion Property. Expected daily vehicular trips associated with the mansion would include the ingress and egress of the mayor and security guards. Use of the proposed secure driveway would therefore result in minimal daily traffic on the currently undeveloped NPS Property.

The installation of perimeter fencing on the NPS Property could potentially reduce the occurrence of collisions between automobiles on Foxhall Road and deer.

Under the Proposed Action, daily traffic onto the Mansion Property would increase minimally over existing conditions at the currently unoccupied property.

Under development of the Proposed Action alternative, the movement of construction vehicles would result in short-term impacts to traffic flow in the vicinity of the NPS Property and Mansion Property. When the signalized intersection is developed at the intersection of Foxhall Road and Whitehaven Parkway as planned by DDOT, the minor amount of controlled daily traffic associated with the use of the proposed facilities would result in no long-term impacts to traffic flow in the vicinity of the properties. When occasional high-attendance events were conducted at the mayoral grounds, the signal-controlled traffic associated with the event would not likely result in inadequate traffic flow on Foxhall Road.

Georgetown Properties

Under the Proposed Action alternative, the movement of construction vehicles associated with demolition at the Georgetown Properties would result in short-term impacts to traffic flow in the vicinity of the properties. However, the proposed action would not result in long-term changes to automobile transportation at, or in the vicinity of, the properties.

Mitigation

Construction activities under the Proposed Action Alternative should be planned to minimize interference with traffic near the NPS Property and the Mansion Property. When the traffic signals were added at the intersection of Foxhall Road and Whitehaven Parkway, no long-term mitigation would be required under the Proposed Action alternative.

No Federal Action Alternative

NPS Property and Mansion Property

Implementation of the No Federal Action alternative would not affect automobile transportation on the NPS Property.

Under the No Federal Action alternative, the existing driveway onto the Mansion Property would be retained and used for access to the new mayoral mansion and grounds. Parking associated with the new mansion would be located on the Mansion Property as it would be in the Proposed Action alternative. Traffic on the Mansion Property would minimally increase over existing conditions as described for the Proposed Action Alternative.

During development of the No Federal Action alternative, the movement of construction vehicles could result in short-term impacts to traffic flow in the vicinity of the Mansion Property. The minor amount of increased daily traffic associated with the use of the proposed facilities would result in negligible long-term impacts to traffic flow in the vicinity of the properties. When occasional high-attendance events were conducted at the mayoral grounds, traffic associated with the event could likely result in temporarily inadequate traffic flow on Foxhall Road.

Georgetown Properties

The No Federal Action Alternative would not result in changes to automobile transportation at, or in the vicinity of, the Georgetown Properties.

Mitigation

Construction activities under the No Federal Action Alternative should be planned to minimize interference with traffic near the Mansion Property. Mitigation would potentially be necessary to control heavy traffic during heavily attended events at the proposed mayoral grounds. Possible mitigation to address such circumstances would include police traffic control at the intersection of the mayoral driveway and Foxhall Road.

By-Right Development Alternative

NPS Property and Mansion Property

Implementation of the By-Right Development alternative would not affect automobile transportation at the NPS Property.

Under the By-Right Development alternative, the existing driveway onto the Mansion Property would be developed into a double loaded loop road through the developed subdivision. Private parking for each residence in the subdivision would be located in driveways and garages associated with the residences on the property. Resulting traffic at the Mansion Property would be a substantial increase over existing conditions.

During development of the By-Right Development alternative, the movement of construction vehicles could result in short-term impacts to traffic flow in the vicinity of the Mansion Property. Traffic associated with the new neighborhood could result in long-term adverse impacts to peak hour traffic flow at the intersection of the subdivision loop road and Foxhall Road.

Georgetown Properties

The No Federal Action Alternative would not result in changes to automobile transportation at, or in the vicinity of, the Georgetown Properties.

Mitigation

Construction activities under the By-Right Development Alternative should be planned to minimize interference with traffic near the Mansion Property. Under the By-Right Development alternative, mitigation would potentially be necessary to control heavy traffic during peak hours. Possible mitigation to address such a condition could include a traffic signal at the intersection of the subdivision loop road and Foxhall Road.

Alternative Transportation

Proposed Action Alternative

NPS Property and Mansion Property

Transit and pedestrian transportation at the NPS Property and Mansion Property would not be directly affected by implementation of the Proposed Action Alternative. During development of the proposed mansion, coordination with DDOT to facilitate the development of sidewalks adjacent to the Mansion Property would improve alternative transportation along Foxhall Road in the vicinity of the property.

Georgetown Properties

Alternative transportation would not be affected by implementation of the Proposed Action alternative at the Georgetown Properties.

Mitigation

No mitigation regarding alternative transportation would be required under the Proposed Action alternative.

No Federal Action Alternative

NPS Property and Mansion Property

Transit and pedestrian transportation at the NPS Property and Mansion Property would not be directly affected by implementation of the No Federal Action Alternative. During development of the proposed mansion, coordination with DDOT to facilitate the development of sidewalks adjacent to the Mansion Property would improve alternative transportation along Foxhall Road in the vicinity of the property.

Georgetown Properties

Alternative transportation at the Georgetown Properties would not be affected by implementation of the No Federal Action alternative.

Mitigation

No mitigation regarding alternative transportation would be required under the Proposed Action alternative.

By-Right Development Alternative

NPS Property and Mansion Property

Transit and pedestrian transportation at the NPS Property and Mansion Property would not be directly affected by implementation of the By-Right Development Alternative. During development of the proposed residential neighborhood, coordination with DDOT to facilitate the development of sidewalks adjacent to the Mansion Property would improve alternative transportation along Foxhall Road in the vicinity of the property.

Georgetown Properties

Alternative transportation at the Georgetown Properties would not be affected by implementation of the By-Right Development alternative.

Mitigation

No mitigation regarding alternative transportation would be required under the Proposed Action alternative.

Utilities

Proposed Action Alternative

NPS Property and Mansion Property

In accordance with applicable regulatory requirements, a stormwater management system would be developed in association with the proposed secure driveway and guardhouse on the NPS Property.

Residential utilities on the Mansion Property would potentially need to be upgraded to meet requirements of the mayoral facilities. A stormwater management system would also be developed on the property to accommodate the impervious surfaces of the new mansion and the associated driveway, parking areas, and facilities.

Development of new stormwater management systems at the NPS Property and Mansion Property would potentially improve the function of stormwater management in the vicinity of the properties. Stormwater currently flows off of the curbless portion of Foxhall Road adjacent to the properties, resulting in erosion at the edge of the road and the collection of deep stormwater in depressions near the edge of the road. Stormwater management systems developed on the NPS Property and Mansion Property under the Proposed Action alternative would collect stormwater and convey it away from these depressions. DDOT has also proposed to remedy the problem of runoff from Foxhall Road by installing curb and gutter stormwater management along the Road.

Georgetown Properties

Under the programmed demolition of the Proposed Action alternative, the residential utilities present at the existing townhouse lots would be removed temporarily from the Georgetown Properties to reduce environmental and safety concerns. Utilities would potentially need to be upgraded to provide service if a scholastic boathouse was constructed at this site.

Mitigation

No mitigation regarding utilities would be required under the Proposed Action alternative.

No Federal Action Alternative

NPS Property and Mansion Property

Development under the No Federal Action alternative would have no affect on utilities at the NPS Property.

Under the No Federal Action alternative, residential utilities on the Mansion Property would potentially need to be upgraded to meet requirements of the mayoral facilities. New

stormwater management measures would also be developed on the property to accommodate the impervious surfaces of the new mansion and associated facilities.

Development of new stormwater management systems at Mansion Property would potentially improve the function of stormwater management in the vicinity of the properties as described for the Proposed Action alternative.

Georgetown Properties

The utilities at the existing townhouse properties at the Georgetown Properties would not be affected by the No Federal Action alternative.

Mitigation

No mitigation regarding utilities would be required under the No Federal Action alternative.

By-Right Development Alternative

NPS Property and Mansion Property

Development under the By-Right Development alternative would have no affect on utilities at the NPS Property.

Under the By-Right Development Alternative, residential utilities on the Mansion Property would need to be significantly expanded to meet requirements of the residential subdivision. New stormwater management measures would also be developed on the property to accommodate the impervious surfaces of the new residential facilities and associated roads and driveways.

Development of new stormwater management systems at Mansion Property would potentially improve the function of stormwater management in the vicinity of the properties as described for the Proposed Action alternative.

Georgetown Properties

The utilities at the existing townhouse properties at the Georgetown Properties would not be affected by the By-Right Development alternative.

Mitigation

No mitigation regarding utilities would be required under the No Federal Action alternative.